

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, *ex rel.*, JOHN )  
DOAK, INSURANCE COMMISSIONER, )  
AS RECEIVER FOR PARK AVENUE )  
PROPERTY AND CASUALTY )  
INSURANCE COMPANY, )  
 )  
Plaintiff, )  
 )  
v. ) Case No. CIV-11-864-C  
 )  
PATRICK MONTGOMERY, )  
EMPLOYMENT TRADITIONS, INC.; )  
PEOPLE ESSENTIALS, INC.; )  
E.T. 2, INC.; E.T. 4, INC.; )  
E.T. 6, INC.; E.T. 10, INC.; )  
CFC I/ET, INC.; CFC II/ET, INC.; )  
MONTGOMERY, INC; )  
ACRISURE BUSINESS OUTSOURCING )  
SERVICES, LLC; ACRISURE, LLC; )  
and CAMPBELL MANAGEMENT )  
GROUP, INC., )  
 )  
Defendants. )

**STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

Pursuant to FED. R. CIV. P. 41(a)(1)(A)(ii), Plaintiff State of Oklahoma, *ex rel.* John Doak, Insurance Commissioner, as Receiver for Park Avenue Property and Casualty Insurance Company in Liquidation, by and through its counsel of record, Newton, O'Connor, Turner & Ketchum, P.C., and Defendant Patrick Montgomery, by and through his counsel of record, Hall, Estill, Hardwick, Gable, Golden & Nelson, P.C., hereby stipulate to a dismissal of Plaintiff's claims and causes of action against Defendant

Patrick Montgomery *only* without prejudice, each party to bear their own attorneys' fees and costs.

Respectfully submitted,

**NEWTON, O'CONNOR, TURNER & KETCHUM, P.C.**

/s/ Keith A. Wilkes

Keith A. Wilkes, OBA No. 16750  
Gregory P. Reilly, OBA No. 22284  
Regina L. Nerger, OBA No. 21864  
15 West Sixth Street, Suite 2700  
Tulsa, Oklahoma 74119-5423  
Telephone: 918-587-0101  
Facsimile: 918-587-0102  
[kwilkes@newtonoconnor.com](mailto:kwilkes@newtonoconnor.com)  
[greilly@newtonoconnor.com](mailto:greilly@newtonoconnor.com)  
[gnerger@newtonoconnor.com](mailto:gnerger@newtonoconnor.com)

**ATTORNEYS FOR PLAINTIFF**

**-AND-**

**HALL, ESTILL, HARDWICK, GABLE,  
GOLDEN & NELSON, P.C.**

/s/ \*

Rachel C. Mathis, OBA #16360  
Conor Cleary, OBA #30046  
320 South Boston Avenue, Suite 200  
Tulsa, OK 74103-3706  
Telephone: (918) 594-0820  
Facsimile: (918) 594-0505

**ATTORNEYS FOR PATRICK  
MONTGOMERY**

*\*Signed by filing attorney with permission*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of June, 2012, I electronically filed the foregoing instrument with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following recipients:

Rachel C. Mathis, Esq.  
[rmathis@hallestill.com](mailto:rmathis@hallestill.com)

Henry D. Hoss, Esq.  
[henry.hoss@mcafeetaft.com](mailto:henry.hoss@mcafeetaft.com)

Amy D. White, Esq.  
[amy.white@mcafeetaft.com](mailto:amy.white@mcafeetaft.com)

John M. Bylsma, Esq.  
[jmbylsma@varnumlaw.com](mailto:jmbylsma@varnumlaw.com)

Zachary A. P. Oubre, Esq.  
[Zac.oubre@mcafeetaft.com](mailto:Zac.oubre@mcafeetaft.com)

Conor P. Cleary, Esq.  
[ccleary@hallestill.com](mailto:ccleary@hallestill.com)

*/s/ Keith A. Wilkes*  
Keith A. Wilkes